

SEALED

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION
APRIL, 2009, SESSION

CLERK'S OFFICE U.S. DIST COURT
AT ROANOKE, VA

FILED

APR 23 2009

JOHN F. CORCORAN, CLERK
BY: *J. B. Smith*
DEPUTY CLERK

UNITED STATES OF AMERICA

v.

SHEILA HAIRSTON

Criminal No. *4:09-cr-00023*

INDICTMENT

In Violation of:

Title 18, U.S.C., §1343

A. INTRODUCTION

At all times material to this Indictment:

1. From on or about April 23, 2006, through April 29, 2008, in the Western District of Virginia, the defendant, **SHEILA HAIRSTON**, participated in a wire fraud scheme, as an employee of GSI Commerce, by crediting her personal credit card/debit card accounts with fake customer refunds totaling \$109,684.98.

2. GSI Commerce is an end-to-end-commerce service provider. GSI provides website design, marketing, technology, fulfillment, and customer service capabilities.

3. A client of GSI Commerce is Restoration Hardware. Restoration Hardware is a furniture store.

4. A service provided by GSI Commerce to Restoration Hardware includes customer service capabilities.

HAIRSTON

5. When a customer of Restoration Hardware has an issue with an order that was placed online, GSI Commerce is responsible for answering the phone and assisting that customer.

6. The defendant, **SHEILA HAIRSTON**, was a customer service representative in the GSI Commerce call center in Martinsville, Virginia.

7. The defendant, **SHEILA HAIRSTON**, was responsible for assisting customers in resolving any issues that the customer had, including requesting refunds on behalf of the customer.

8. The defendant, **SHEILA HAIRSTON** would locate legitimate sales in the system and initiate a refund that was not requested by a customer of Restoration Hardware but by the defendant.

9. The defendant, **SHEILA HAIRSTON**, would then change the credit card on file to one of her own debit cards.

10. The defendant, **SHEILA HAIRSTON**, would key in the credit card account numbers of accounts belonging to her.

11. When the defendant, **SHEILA HAIRSTON**, would credit the money to her credit card, Mastercard and Visa servers would determine whether or not a specific transaction could be authorized. The access device was “approved” or “declined” as a result.

12. The Mastercard servers are located in Missouri.

13. The Visa servers are located in California

14. The sales defendant, **SHEILA HAIRSTON**, refunded were never requested by the actual customer.

15. The defendant, **SHEILA HAIRSTON**, was provided a user id and password by her employer, GSI, that allowed her to authorize the refund..

16. The defendant, **SHEILA HAIRSTON**, refunded a total of 190 (one hundred and ninety) transactions using her user work id and password to credit her debit cards knowing her credit card and debit cards had not been used to make the initial purchases.

17. The customer credits for items purchased were credited to the following bank accounts belonging to the defendant, **SHEILA HAIRSTON**:

BANK	DEFENDANT'S CREDIT CARD/ DEBIT CARD ACCOUNT REFUNDED	AMOUNT OF MONEY CREDITED TO DEFENDANT'S ACCOUNT
American National Bank & Trust	#0485	\$8,909.66
American National Bank & Trust	#6588	\$1,213.70
Bank of America	#9082	\$1,466.97
Bank of America	#2923	\$4,106.85
Bank of America	#3183	\$5,580.76
Bank of America	#7924	\$6,796.73
Bank of America	#5397	\$8,174.45
Bank of America	#8635	\$3,902.75
Bank of America	#4340	\$3,589.14
Bank of America	#6847	\$5,989.09
Bank of America	#8430	\$11,086.31
Bank of America	#6798	\$4,715.65
Bank of America	#3805	\$3,356.58
Bank of America	#4999	\$2,761.70
Bank of America	#8809	\$3,081.73
BB & T	#9415	\$3,739.92

BB & T	#5216	\$16,084.24
Citibank	#2169	\$6,176.46
Citibank	#2167	\$638.69
HSBC	#8719	\$2,149.09
HSBC	#9713	\$516.35
Suntrust	#2856	\$861.68
Wachovia	#0029	\$953.09
Wachovia	#0037	\$3,830.39

18. A total of \$109,684.98 was credited to twenty-four different debit cards linked to bank accounts associated with the defendant, **SHEILA HAIRSTON**, from GSI commerce.

19. The BB & T accounts were linked to a single checking account in the name of the defendant, **SHEILA HAIRSTON**.

20. The Wachovia Bank accounts were linked to a single checking account in the name of the defendant, **SHEILA HAIRSTON**.

21. The American National & Trust accounts were in the name of the defendant, **SHEILA HAIRSTON**.

22. The Citibank accounts were in the name of the defendant, **SHEILA HAIRSTON**.

23. The HSBC accounts were in the name of the defendant, **SHEILA HAIRSTON**.

24. The Suntrust accounts were linked to a checking account in the name of the defendant, **SHEILA HAIRSTON**.

25. The Bank of America account ending in #5397 was in the name of the New Holy Deliverance Temple and the defendant, **SHEILA HAIRSTON**, was the card holder. The Bank of America account ending in #8635 is also linked to the same checking account.

26. The remaining Bank of America accounts were in the name of the defendant, **SHEILA HAIRSTON**.

27. When the defendant, **SHEILA HAIRSTON**, credited her credit card accounts, the transactions were processed through the servers outside Virginia for Mastercard which is located in California and Visa which is located in Missouri.

COUNT ONE through COUNT TWENTY-SIX
(WIRE FRAUD)

The Grand Jury charges that:

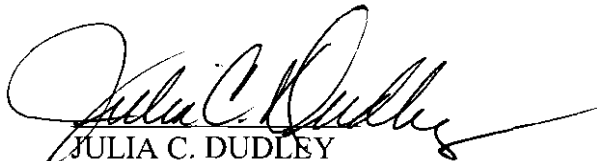
1. The Introduction to the Indictment is realleged and made a part of this Count.
2. On or about April 13, 2006, through May 8, 2008, in the Western District of Virginia, the defendant, **SHEILA HAIRSTON**, for the purpose of executing and attempting to execute, the scheme and artifice to defraud, and to obtain money by false or fraudulent pretenses, representations, and promises, did knowingly cause to be transmitted by means of a wire communication in interstate commerce, certain signs, signals, and sounds, as described below:

COUNT	DATE	FINANCIAL INSTITUTION	CARD NUMBER	TOTAL AMOUNT CREDITED	SERVER/ LOCATION for VISA/MASTER CARD
1	06/16/06	BB&T	#9415	\$1,432.00	California/Visa
2	09/16/06	BB&T	#9415	\$1,114.06	California/Visa
3	06/23/06	Bank of America	#2923	\$1,317.40	California/Visa
4	06/30/06	Bank of America	#2923	\$930.90	California/Visa
5	07/26/06	Bank of America	#3183	\$1,275.95	California/Visa
6	09/07/06	Bank of America	#3183	\$1,177.25	California/Visa

7	05/27/06	Bank of America	#4340	\$1,286.20	California/Visa
8	10/14/06	Bank of America	#6847	\$1,808.30	California/Visa
9	12/05/06	Bank of America	#6487	\$1,290.60	California/Visa
10	09/17/06	Wachovia	#0037	\$1,014.00	California/Visa
11	06/16/06	Wachovia	#0029	\$487.61	California/Visa
12	08/23/07	BB&T	#5216	\$945.00	California/Visa
13	10/11/07	American National Bank & Trust	#0485	\$1,016.07	California/Visa
14	08/25/07	American National Bank & Trust	#0485	\$921.27	California/Visa
15	10/17/07	Citibank	#2169	\$636.00	Missouri/Mastercard
16	07/20/07	HSBC	#8719	\$730.08	Missouri/Mastercard
17	03/09/07	Bank of America	#8430	\$995.95	California/Visa
18	03/15/07	Bank of America	#8430	\$995.95	California/Visa
19	04/20/07	Bank of America	#8430	\$967.76	California/Visa
20	04/26/08	Suntrust	#2856	\$430.84	California/Visa
21	04/08/08	BB & T	#5216	\$589.70	California/Visa
22	01/05/08	American National Bank & Trust	#0485	\$432.96	California/Visa
23	02/28/08	Bank of America	#5397	\$824.45	California/Visa
24	02/21/08	Bank of America	#6798	\$1,023.99	California/Visa
25	04/03/08	Citibank	#2169	\$480.90	Missouri/Mastercard
26	05/07/08	HSBC	#9713	\$311.76	Missouri/Mastercard

2. All in violation of Title 18, United States Code, Sections 1343 and 2.

A TRUE BILL this 23 day of April, 2009.



JULIA C. DUDLEY
U. S. ATTORNEY



FOREPERSON